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*Attorneys for Defendant Capital One, N.A.,  
erroneously sued as “Capital One Bank, National Association”*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MA OLIVIA ABAD,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES LLC;  
EXPERIAN INFORMATION SOLUTIONS,  
INC.; JPMORGAN CHASE BANK, N.A.;  
CITIBANK, N.A.; SYNCHRONY  
FINANCIAL; CAPITAL ONE BANK,  
NATIONAL ASSOCIATION; BANK OF  
AMERICA CORPORATION; AMERICAN  
EXPRESS, INC. and DISCOVERY BANK,

Defendants.

CASE NO.: 2:25-CV-00090-CDS-NJK

**STIPULATION AND ORDER TO EXTEND  
TIME FOR DEFENDANT CAPITAL ONE,  
N.A. TO FILE RESPONSIVE PLEADING  
TO COMPLAINT**

**(FIRST REQUEST)**

Pursuant to Local Rules 6-1 and 6-2, Plaintiff Ma Olivia Abad (“Plaintiff”) and Defendant Capital One, N.A., erroneously sued as “Capital One Bank, National Association” (“Capital One” and together with Plaintiff, the “Parties”) stipulate and agree as follows:

**WHEREAS:**

1. On or about January 29, 2025, Capital One was served with the Summons and Complaint for the above-referenced matter;
2. On February 18, 2025, counsel for Capital One reached out to Plaintiff’s counsel to gather further information regarding Plaintiff’s claims and explore the potential for an early resolution;
3. On February 18, 2025, the Parties agreed that good cause exists to extend Capital

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One's responsive pleading deadline to allow the parties to continue to devote resources to exploring the potential for early resolution of this matter;

4. The Parties agree to extend the deadline for Capital One to file its responsive pleading to the Complaint to March 21, 2025;

5. This stipulation is made in good faith and not for the purpose of delay; and

6. This is the first stipulated request to extend Capital One's responsive pleading deadline.

**NOW, THEREFORE, IT IS HEREBY STIPULATED THAT:**

Capital One's time to file a responsive pleading to Plaintiff's Complaint is extended. Capital One shall file its responsive pleading on or before March 21, 2025.

DATED this 19th day of February, 2025.

DATED this 19th day of February, 2025.

McDONALD CARANO LLP

FREEDOM LAW FIRM, LLC

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*Attorneys for Defendant Capital One,  
N.A., erroneously sued as "Capital One  
Bank, National Association"*

*Attorneys for Plaintiff Ma Olivia Abad*

**NO FURTHER EXTENSIONS OF THIS  
DEADLINE WILL BE GRANTED.**

**IT IS SO ORDERED:**

  
United States Magistrate Judge

DATED: February 20, 2025